

United States District Court
Eastern District of Michigan
Northern Division

United States of America,

Plaintiff,

Case No. 20-20517

v.

Hon. Denise Page Hood

Stephen Shipps,

Defendant.

_____ /

Addendum to the Plea Agreement

As part of the plea agreement in this case, the parties agree that the following language shall supersede and replace paragraph 8.C of the Plea Agreement (Plea Agreement, ECF No. 24, PageID 112–113):

.....

8.C Other Guideline Recommendations

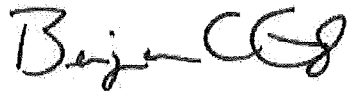
The parties also recommend under Federal Rule of Criminal Procedure 11(c)(1)(B) that the following guideline provisions apply:

- Pursuant to USSG §2G1.1(a)(1) (Nov. 2001), the defendant's base offense level is 19;

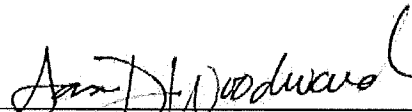
- Pursuant to USSG §2G1.1(b)(2) (Nov. 2001), the defendant's guideline range is increased by two levels because MV-1 was 15 years old when defendant began engaging in sexually inappropriate activity with her;
- Pursuant to USSG §3B1.3, the defendant's guideline range is increased by two levels because defendant abused his position of trust (to wit: as MV-1's violin teacher and mentor) and used a special skill (to wit: his expertise in violin) to facilitate the commission of the offense;
- Pursuant to USSG §4B1.5(b) (Nov. 2001), the defendant's guideline range is increased by 5 levels because he engaged in a pattern of activity involving prohibited sexual conduct.

The parties have no other recommendations as to the defendant's guideline calculation.

Dawn N. Ison
United States Attorney

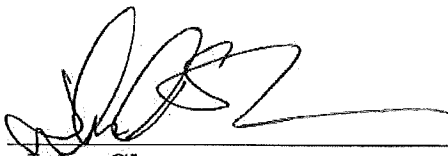


Benjamin Coats
Chief, Major Crimes Unit
Assistant U.S. Attorney

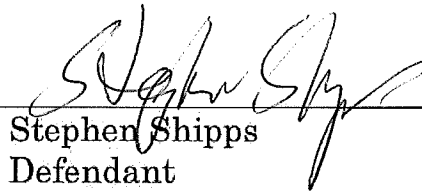


Sara D. Woodward
Assistant U.S. Attorney

Dated: April 6, 2021



John Shea
Attorney for Defendant



Stephen Shipps
Defendant

Dated: 4/6/22